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**Via ECFS**

February 27, 2009

Marlene Dortch, Secretary  
Federal Communications Commission  
Room TW-B204  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

*RE: EB Docket No. 06-36: Annual 47 C.F.R. §§ 64.2009(e) CPNI Certification*

Dear Ms. Dortch:

Enclosed for filing with the Federal Communications Commission ("FCC"), please find the 2008 annual CPNI compliance certificate for TELUS Communications Company ("TELUS").

The following TELUS affiliates also hold federal registration numbers ("FRN"s) from the FCC, but did not provide any telecommunications services during the 2008 calendar year, and, therefore, are not required to submit a compliance certificate: TELUS Enterprise Solutions Corporation ("TESC"), TELUS Communications Inc. ("TCI"), and TELUS Corporation. TELUS notes, however, that to the extent that these entities in the future may provide telecommunications, TELUS's CPNI policies stated herein will apply to all such entities.

If you have any questions regarding the attached CPNI Compliance certificate, please contact Erin Emmott, Director, International Regulatory Affairs at (202) 536-3160, or via email at [erin.emmott@telus.com](mailto:erin.emmott@telus.com).

Thank you for your assistance with this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Michael Hennessy'.

Michael Hennessy  
Senior Vice-President, Regulatory and Government Affairs

Attachments

cc: Best Copy and Printing Inc. (via email: [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com))

**TELUS COMMUNICATIONS COMPANY**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date Filed: February 27, 2009

Names of company covered by this certification: TELUS Communications Company<sup>1</sup>

Name of Signatory: Michael Hennessy

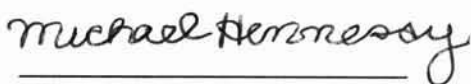
Title of Signatory: Senior Vice-President, Regulatory and Government Affairs

I, Michael Hennessy, certify that I am an authorized officer of TELUS Communications Company ("TELUS"), and acting as an agent of TELUS, I have personal knowledge that it has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, *see* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is a statement explaining how TELUS' procedures ensure that it is in compliance with the requirements set forth in section 64.2001 *et seq* of the Commission's rules. TELUS has implemented policies and procedures designed to safeguard CPNI. TELUS also has implemented network security measures, including encryption to protect the data stored in its system.

TELUS did not take any actions against data brokers in the past year. Nor has TELUS uncovered any information regarding the processes that pretexters are using to attempt to access the CPNI of TELUS' customers. TELUS did not receive any customer complaints in 2008 regarding the unauthorized release of CPNI.

Respectfully Submitted,



Michael Hennessy  
Senior Vice-President, Regulatory and Government Affairs  
TELUS

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<sup>1</sup> As stated in the cover letter, although four TELUS entities hold FRNs from the Commission, only one TELUS entity—TELUS Communications Corporation—provided any telecommunications services during the 2008 calendar year. Accordingly, the remaining entities are not required to submit CPNI certifications. To the extent that such entities in the future provide telecommunications services, they will be bound by the CPNI policy stated herein.

**TELUS COMMUNICATIONS COMPANY  
STATEMENT OF CPNI OPERATING PROCEDURES**

TELUS Communications Company ("TELUS") is a telecommunications carrier operating primarily in Canada. In particular, TELUS provides telecommunications services, primarily wholesale telecommunications services, to U.S. carriers and U.S. service providers. TELUS also provides service extensions (e.g., private line, frame relay services) to Canadian customers with branch offices in the United States.

TELUS has established policies and procedures to comply with the FCC's rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in title 47, section 64.2001 *et seq.* of the Code of Federal Regulations. These procedures ensure that each company is compliant with the FCC's CPNI rules. This statement is a summary of TELUS' policies and procedures designed to safeguard CPNI.

1. TELUS may use, disclose and/or permit access to CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers with locations in the United States for the following purposes:
  - (A) for the provision of the telecommunications services from which such information is derived, or
  - (B) for the provision of services necessary to, or used in, the provision of such telecommunication service, including the publishing or directories; or,
  - (C) for the following limited purposes:
    - (1) to initiate, render, bill, and collect for telecommunications services;
    - (2) to protect the rights or property of TELUS, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
    - (3) to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and,
    - (4) to the extent applicable, to provide call location information concerning the user of a wireless services:
      - (i) to a public safety answering point ("PSAP"), emergency medical service provider, or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services;
      - (ii) to inform the user's legal guardian or member of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm; or
      - (iii) to providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.
2. TELUS does not use CPNI relating to U.S. customers and/or the telecommunications services that TELUS provides to customers located in the United States to conduct outbound marketing or in connection with its sales and marketing campaigns. TELUS also does not disclose or permit access to CPNI relating to U.S. customers and/or telecommunications services that TELUS provides to customers located in the United States to affiliates or third parties for marketing purposes. TELUS has expressly identified the use, disclosure, or access to CPNI relating to U.S. customers and/or the telecommunication services that

TELUS provides to customers located in the United States for marketing purposes as a non-legitimate business purpose.

3. TELUS has implemented privacy and other ethical policies and procedures that restrict and prohibit its personnel from accessing and/or making use of customer data or information, including CPNI, for purposes other than legitimate business purposes.
4. TELUS trains its personnel in relation to these privacy policies and procedures, and, in particular, when personnel are and are not permitted to use CPNI. TELUS has established disciplinary procedures, including and up to termination, for violations of these policies and procedures.
5. TELUS has implemented procedures to authenticate its customers.
6. TELUS has instituted measures to discover and protect against unauthorized attempts to access CPNI. Among other measures, TELUS has adopted implemented internal security procedures and other network security protocols, including, without limitation, encrypting data.
7. TELUS has implemented policies pursuant to which it will track any breaches of CPNI, and will notify the United States Secret Service and the Federal Bureau of Investigation, and its customer (if permitted) upon reasonable discovery of a breach of CPNI. TELUS will maintain a record of such information for a two-year period.
8. TELUS will track customer complaints regarding CPNI.
9. TELUS will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that TELUS has established to safeguard CPNI.